

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDREW PERRONG, on behalf of himself	:	
and others similarly situated,	:	CIVIL ACTION FILE NO. 2:20-cv-3774
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
PLATINUM PLUS AUTO PROTECTION,	:	
INC.	:	
	:	
Defendant.	:	

---

**STIPULATION OF DISMISSAL**

NOW COMES the parties, by and through their respective attorneys, and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), and the Plaintiff hereby voluntarily dismiss all of his claims against the Defendant with prejudice, each party to pay their own costs. The putative class claims are dismissed without prejudice.

Dated: March 1, 2021

Respectfully submitted,

By: /s/ Anthony I. Paronich  
Anthony I. Paronich (*pro hac vice*)  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
[o] (617) 485-0018  
[f] (508) 318-8100  
anthony@paronichlaw.com  
*Attorneys for Plaintiff*

By: /s/ Matthew A. Keilson  
C. Celeste Creswell (*pro hac vice*)  
Matthew A. Keilson (*pro hac vice*)  
**KABAT CHAPMAN & OZMER LLP**  
17th Street NW, Suite 1550  
Atlanta, Georgia 30363  
T: (404) 400-7300  
F: (404) 400-7333  
mkeilson@kcozlaw.com  
ccreswell@kcozlaw.com

*Counsel for Platinum Plus Auto Protection, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on this 1<sup>st</sup> day of March, 2021 on all counsel of record via the Court's CM/ECF system.

/s/ Anthony I. Paronich  
Anthony I. Paronich